# STATE OF ILLINOIS ILLINOIS COMMERCE COMMISSION

AMEREN TRANSMISSION COMPANY OF ) ILLINOIS )	
Petition for a Certificate of Public Convenience and Necessity, pursuant to Section 8-406.1 of the Illinois Public Utilities Act, and an Order pursuant to Section 8-503 of the Public Utilities Act, to Construct, Operate and Maintain a New High Voltage Electric Service Line and Related Facilities in the Counties of Adams, Brown, Cass, Champaign, Christian, Clark, Coles, Edgar, Fulton, Macon, Montgomery, Morgan, Moultrie, Pike, Sangamon, Schuyler, Scott and	Docket No. 12-0598
Shelby, Illinois.	

#### VERIFIED PETITION FOR LEAVE TO INTERVENE

Peggy Mills and Laura Te Grotenhuis, collectively known as Stop the Power Lines Coalition, by its attorneys, Hinshaw & Culbertson LLP, petition for leave to intervene in this proceeding. In support of its petition, petitioner states:

- 1. Both of the members of Stop the Power Lines Coalition, Ms. Mills and Ms. Te Grotenhuis, own property in Clark County that is described on Exhibit C to the Verified Petition filed by Ameren Transmission Company of Illinois ("Ameren") as lying within the primary route between Kansas to Indiana State identified by Ameren for its proposed 345 kV line. The interests of the members of Stop the Power Lines Coalition will be directly and adversely affected if the proposed Ameren transmission line is located on its property.
- 2. Stop the Power Lines Coalition agrees to accept the status of the record as it exists at the time of the filing of this Petition and to accept service by electronic means as provided in Section 200.1050 of the Commission's Rules of Practice (83 Ill. Adm. Code §200.1050). For the purpose of receiving service in this proceeding, Stop the Power Lines Coalition requests that the following persons be placed on the official service list:

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Peggy Mills 21547 East Macke Rd. Marshall, IL 62441 peg@turbinesinc.com

Laura Te Grotenhuis 14435 North State Highway 1 Marshall, IL 62441 cyclone@joink.com

3. Petitioner contemplates that an amended petition to intervene will be filed subsequently identifying additional members of Stop the Power Lines Coalition.

WHEREFORE, Petitioner herewith prays it be granted leave to intervene, and become a party to the above styled proceeding as Stop the Power Lines Coalition, for the purpose of producing evidence and cross-examining witnesses and with the right to file appropriate briefs and pleadings and participate in oral argument before the Commission, should oral argument be granted.

# Respectfully submitted,

### STOP THE POWER LINES COALITION

/s/ Edward R. Gower
Edward R. Gower
One of Its Attorneys

Edward R. Gower Hinshaw & Culbertson LLP 400 South Ninth Street Suite 200 Springfield, IL 62701 217-528-7375 egower@hinshawlaw.com

Dated: December 21, 2012

Adam Guetzow Hinshaw & Culbertson LLP 222 N. LaSalle St. Suite 300 Chicago, IL 60601-1081 312-704-3129 aguetzow@hinshawlaw.com

STATE OF ILLINOIS	)	
	)	SS
COUNTY OF SANGAMO	N)	

## **VERIFICATION**

Edward R. Gower, being first duly sworn, deposes and says that he is one of the practicing attorneys in the firm of Hinshaw & Culbertson LLP and one of the attorneys for Stop the Power Lines Coalition, and he is duly authorized to execute this Petition for Leave to Intervene; that he has read the above foregoing document, has knowledge of the facts stated therein and states that the matters set forth therein are true in substance and in fact.

Edward R. Gower
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SUBSCRIBED AND SWORN TO before me, a Notary Public, on this 21st day of

December, 2012.

OFFICIAL SEAL
KATHLEEN BENNER
NOTARY PUBLIC - STATE OF ILLINOIS
MY COMMISSION EXPIRES:07/28/13

OTARY PUBLIC